

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

In re
ANDREW GREENHUT,
Debtor

IN PROCEEDINGS UNDER
CHAPTER 13
CASE NO.: 19-10782

MOTION OF DEBTOR TO AMEND CHAPTER 13 PLAN

NOW COMES, the Debtor, Andrew Greenhut, and hereby moves this Honorable Court, pursuant to 11 U.S.C. § 1323(a), MLBR 3015-1 and Chapter 13 Rule 13-10(b), to allow him to amend his Chapter 13 Plan prior to confirmation. As grounds therefore, the Debtor states the following:

1. The Debtor has amended his Chapter 13 Plan to correct certain typographical and arithmetic errors that were identified by the Chapter 13 Trustee during the Meeting of Creditors held on May 2, 2019 and in her Objection to the Debtor's Original Chapter 13 Plan filed on May 6, 2019, as well as those identified by Debtor's Counsel thereafter.
2. The Plan Payment Amount and the Plan Term remains unchanged from the Original Chapter 13 Plan.

WHEREFORE, the Debtor respectfully requests that the Court allow the amendment of his Chapter 13 Plan and grant all other relief deemed just and proper.

ANDREW GREENHUT, Debtor
By his Attorney,

Date: 5/6/2019

/s/ Richard N. Gottlieb, Esq.
Richard N. Gottlieb, Esq. BBO# 547970
Law Offices of Richard N. Gottlieb
Ten Tremont Street
Suite 11, 3rd Floor
Boston, MA 02108
(617) 742-4491
rnglaw@verizon.net

UNITED STATES BANKRUPTCY COURT
FOR THE
DISTRICT OF MASSACHUSETTS

In re
ANDREW GREENHUT,
Debtor

IN PROCEEDINGS UNDER
CHAPTER 13
CASE NO.: 19-10782

CERTIFICATE OF SERVICE

I, Richard N. Gottlieb, Esq., do hereby certify that I have this day served a copy of the Motion of Debtor to Amend Chapter 13 Plan and a copy of the Debtor's First Amended Pre-Confirmation Chapter 13 Plan dated March 11, 2019, by First-class mail postage paid and/or electronically via the CM/ECF Electronic Messaging System on the persons listed below.

Date: May 6, 2019

/s/ Richard N. Gottlieb, Esq.

Richard N. Gottlieb, Esq. BBO # 547970
Law Offices of Richard N. Gottlieb
Ten Tremont Street
Suite 11, 3rd Floor
Boston, Massachusetts 02108
(617) 742-4491
rnglaw@verizon.net

PERSONS SERVED:

Carolyn Bankowski, Esq.
Chapter 13 Trustee
(Served via CM/ECF)

Alex Mattera, Esq.
Partridge, Snow and Hahn, LLP
Counsel to Gita Srivastava
(Served via CM/ECF)

Barclays Bank Delaware
Attn: Correspondence
Po Box 8801
Wilmington, DE 19899

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130

Chase Card Services
Correspondence Dept
Po Box 15298
Wilmington, DE 19850

Christopher and Andrea Haas

164R Summer Street
Arlington, MA 02474

Gloria and Alan Greenhut

1560 45th Street
Brooklyn, NY 11219

Internal Revenue Service

P.O. Box 7346
Philadelphia, PA 19101-7346

Mass. Dept. of Revenue

P.O. Box 9564
Boston, MA 02204

Rtn Federal Credit Union

600 Main St
Waltham, MA 02452